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express company, although it could not have been compelled to undertake such transportation.

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**Admission of Attorneys.**—The question as to the power of the legislative branch of the government to establish qualifications and regulate the admission of attorneys is passed upon by the Supreme Court of North Carolina in the matter of Applicants for License, 55 Southeastern Reporter, 635. The court, after reviewing numerous authorities, holds that a statute prescribing qualifications does not violate the constitutional provision that the legislative branch of the government shall have no power to deprive the judicial department of any power or jurisdiction which rightly pertains to it. In *re Day*, 181 Ill. 73, 54 N. E. 646, is opposed to this holding. An effect of the North Carolina holding is that one presenting the certificate of two attorneys as to good moral character is entitled to admission without investigation by the court on this point, even though his character be attacked by formal charges.

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**Right of Dower Barred by Judicial Sale.**—The Supreme Court of Iowa in *Pierce v. O'Neil*, 109 Northwestern Reporter, 1082, holds that a sale in strict accordance with the terms of a trust deed in which the wife of the grantor had not joined was in effect a judicial sale, and that the dower rights of the grantor's wife were, therefore, barred. The court says that the sale is a judicial one under the statutory provision that trust deeds may be foreclosed in accordance with their terms.

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**Trades Unions—Discrimination against Members.**—The validity of the federal statute of 1898 prohibiting common carriers engaged in interstate commerce from discriminating against employees or applicants for employment who are members of trades unions is denied in *United States v. Scott*, 148 Federal Reporter, 431. The court denies the validity of the provision on two grounds: (1) That the provision is not in the constitutional sense a regulation of commerce, or commercial intercourse among the states, and cannot justly nor fairly be so construed or treated, inasmuch as its essential object manifestly is only to regulate certain phases of the right of an employer to choose his own servants, whether the duties of those servants when employed shall relate to interstate commerce or not; and (2) upon the ground that the provision is so broad as to be condemned by the rule laid down in *Trade-Mark Cases*, 100 United States, 82, wherein it was said that if it is the main purpose of an enactment to establish a regulation applicable to all trade, to commerce at all points, especially if it be apparent that it is designated to govern the commerce wholly between citizens of the same state, it is obviously the exercise of a power not confided to Congress.